## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

LG. PHILIPS LCD CO., LTD.,	)
Plaintiff,	) C.A. No. 05-292 (JJF)
v.	)
TATUNG COMPANY;	)
TATUNG COMPANY OF AMERICA, INC.; CHUNGHWA PICTURE TUBES, LTD.;	)
AND VIEWSONIC CORPORATION,	)
Defendants.	)

## AFFIDAVIT OF MATTHEW W. KING IN SUPPORT OF DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON DAMAGES UNDER 35 U.S.C. § 287

STATE OF DELAWARE	)
	) ss.
NEW CASTLE COUNTY	)

Matthew W. King, being duly sworn, deposes and says:

- 1. My name is Matthew W. King. I am an attorney with the law firm of Richards, Layton & Finger, PA, One Rodney Square, Wilmington, DE 19899.
- 2. I am counsel for Defendants Chunghwa Picture Tubes, Ltd., Tatung Company, Tatung Company of America, Inc. and Viewsonic Corporation in the above-captioned matter.
- 3. I submit this affidavit in support of Defendants' Motion For Partial Summary Judgment On Damages Under 35 U.S.C. § 287.
- 4. Attached hereto as **Exhibit 1** is a true and correct copy of a letter from Jeong-Hwan Lee, Vice President of L.G. Philips, to Cheng-Yuan Lin, President of Chunghwa Picture Tubes, Ltd dated February 8, 2002.

- 5. Attached hereto as <u>Exhibit 2</u> is a true and correct copy of a letter from Jeong-Hwan Lee, Vice President of L.G. Philips, to Cheng-Yuan Lin, President of Chunghwa Picture Tubes, Ltd dated February 27, 2002.
- 6. Attached hereto as <u>Exhibit 3</u> is a true and correct copy of Plaintiff's Supplemental Responses And Objections To Defendants' First And Second Sets Of Interrogatories.
- 7. Attached hereto as <u>Exhibit 4</u> is a true and correct copy of Defendant Tatung Company's Supplemental Response To Plaintiff's Amended First Set Of Interrogatories.
- 8. Attached hereto as <u>Exhibit 5</u> is a true and correct copy of Defendant Tatung Company of America Inc.'s Supplemental Response To Plaintiff's Amended First Set Of Interrogatories.
- 9. Attached hereto as <u>Exhibit 6</u> is a true and correct copy of Defendant Viewsonic Corporation's Supplemental Response To Plaintiff's Amended First Set Of Interrogatories.
- 10. Attached hereto as **Exhibit 7** is a true and correct copy of United States Patent No. 5,019,002.

Matthew W. King (#4566)

SWORN TO AND SUBSCRIBED before me, a Notary Public for the State and County aforesaid, on this day of June, 2006.

My Commission Expires: 39 200

Notary Public NOTARY PUBLIC

STATE OF DELAWARE

My Commission Expires May 9, 2007

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 13, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing to, and also hand delivered same to:

Richard D. Kirk Morris James Hitchens & Williams LLP 222 Delaware Avenue, Suite 900 Wilmington, DE 19899

I HEREBY CERTIFY that on June 13, 2006, I sent the foregoing document by Electronic Mail to the following non-registered participants:

Gaspare J. Bono Matthew T. Bailey Andrew J. Park Adrian Mollo McKenna Long & Aldrige LLP 1900 K Street, NW Washington, DC 20006

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